

Castle Primary School - Artificial Intelligence Policy (AI Policy)

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1. Introduction

Artificial Intelligence (AI) technology is already widely used in both commercial and everyday applications and its influence is anticipated to grow exponentially. It is expected to impact almost all industries and job sectors including education. Generative AI refers to technology that can be used to create new content based on large volumes of data from a variety of sources that models have been trained on. AI is a rapidly evolving and is already the basis for many AI tools for tasks such as writing, creating audio, writing code and producing images and video simulations. While AI provides opportunities for society, it also increases risk.

AI offers numerous opportunities in education for enhancing teaching, learning, and administration. This policy establishes guidelines for the responsible and effective use of AI within Castle Primary School. By embracing AI technology, we aim to:

- Enhance academic outcomes and educational experiences for pupils
- Support teachers in managing their workload more efficiently and effectively
- Educate staff and pupils about safe, responsible and ethical AI use
- Incorporate AI as a teaching and learning tool to develop staff and pupils' AI literacy and skills
- Prepare staff and pupils for a future in which AI technology will be integral
- Promote equity in education by using AI to address learning gaps and provide personalised support
- Improve and streamline school operations to minimise cost and maximise efficiency.
- Embed data protection by design into our culture and processes which take account of the technical complexities of AI systems.

The school recognises that the technology is rapidly evolving and is committed to remaining at the forefront of developments and adapting our ways of teaching and working as necessary. We recognise the leadership in the education sector provided by the Department of Education and the guidance set out in the department's [Statement on Generative Artificial Intelligence in Education](#). This AI policy has been shaped by this guidance. Hence as this guidance and the technology changes this policy will be reviewed and updated where appropriate. This policy will be reviewed regularly.

Regardless of technical advances, all users of AI in education will be expected to comply with the laws, regulations, policies and guidelines applicable to Keeping Children Safe in Education (KCSIE), protecting intellectual property and copyright, and data protection including the UK GDPR and the [Information Commissioner's Guidance on AI and Data Protection](#).

By combining the benefits of AI technology with professionals' expertise, experience, and professional judgment, we can create a safe collaborative and effective educational environment that maximises the benefits of both human and AI capabilities.

2. Purpose

The purpose of this policy is to define the Castle Primary School approach to adoption of AI based applications tools and services to support teaching and administration in the school. By adhering to this policy, the school aims to foster a responsible and inclusive environment for the use of AI in education upholding privacy, fairness, and transparency for the benefit of all who are involved.

3. Principles

The following principles underpin adoption of AI related technologies at Castle Primary School.

- The school will be transparent and accountable about the use of AI tools so that stakeholders, including staff, pupils, parents and other partners understand where and how AI is used and who is responsible for its use.
- The school will prioritise the safeguarding of our pupils and their online safety and will not knowingly use any AI technology that puts either their safety or privacy at risk.
- There will be no unauthorised use of copyrighted material or creation of content that infringes on the intellectual property of others.
- Staff will not allow or cause intellectual property, including pupils' work, to be used to train Generative AI models without either appropriate permissions or exemptions to copyright.
- Crucially the school will not use AI technology that lessens the level of data protection already in place.
- Any feedback or questions about the use of AI at Castle Primary School will be considered and responded to appropriately.

4. Applicability

This policy applies to all staff, including temporary staff, consultants, governors, volunteers, and contractors, and anyone else working on our behalf. It is also applicable to pupils, but it is recognised that this group will require some support and guidance from staff as part of their learning.

This policy is also linked to other school policies, including the Safeguarding and Child Protection Policy, Data Protection Policy, Information Security Policy, Acceptable Use Policy and Procurement Policy and should be read in conjunction with them.

5. Roles and Responsibilities

All staff are responsible for reading and understanding this policy and any instructions related to any AI technology before using it.

All leaders are responsible for ensuring their staff / team have read and understand this policy before using AI technology and that they follow this policy, including reporting any suspected breaches of it. Where there is any difficulty understanding either this policy or any instructions related to the use of AI technology, leaders are to report any concerns to the school's lead responsible for overseeing the adoption of AI at the school.

Key contributors to the school's AI approach to the development and the adoption of any technology that uses AI in the school, this AI policy and compliance with this policy include:

- The Headteacher is the lead for our school regarding the adoption of and use of AI technology in the school. They will monitor compliance with this policy and work with other staff to communicate, promote and regulate AI use, providing or arranging for training to be given where necessary.
- The Headteacher is the safeguarding lead who has responsibility for considering how to keep children safe while they use applications and services that use AI technologies.
- The Castle Primary School DPO is responsible for advising us about our data protection obligations in relation to the use of AI. Our Data Protection Officer is One West.
- Our IT lead, Computeam, provides technical support and guidance on the technical aspects of using AI in the school.
- The school's Governing Body will oversee the governance of adopting AI applications and services in the school. The Governing Body will be responsible for monitoring compliance with AI related regulatory requirements and this policy.

6. Key considerations while using AI

AI applications and services, in particular those that use generative AI, should be used cautiously and with an awareness of its limitations. Whether staff are using AI for teaching or school administrative purposes, or with pupils who will make use of this technology for learning, everyone should be mindful of, and instruct pupils about, the following:

- **Bias** – outputs from AI based tools may reflect any inherent biases in the data set used to produce it. This could include content that may be discriminatory based on factors such as race, gender, or socioeconomic background.
- **Accuracy** – information may be inaccurate when it is generated. Hence AI based outputs should be checked for accuracy before it is issued.
- **Currency** – some AI models only collate data prior to a certain date so content generated may not reflect the most recent information.

7. Use of AI

Staff are encouraged to consider using AI-based tools and technologies to assist in their work and the work of others. AI tools should be used responsibly and ensure the outputs complement the professional judgment and expertise of staff rather than replace it. Regardless of how it is used, all staff remain professionally responsible and accountable for the quality and content of any output generated by AI tools. Examples of tasks that may use AI include marking and feedback, writing emails and other correspondence, report writing, lesson planning, professional development, HR administration and facilities management.

Where it is needed staff will be given appropriate instruction, training and support so that they can effectively and safely integrate AI applications and services into their work. Training and support will either be planned as part of staff personal development reviews and appraisals or on an as required basis. Staff who are responsible for the introduction of and subsequent oversight of the use of any AI tools should endeavour to identify any training and development requirements at a project's inception. All staff are responsible for discussing their individual training needs to make use of any AI tools they use with their line manager.

7.1 Use of AI in teaching

AI tools can assist staff in gathering and creating relevant educational resources, creating whole group or personalised lesson plans, generating extension tasks or scaffolded work, and identifying potential knowledge gaps. For instance, AI-based platforms can suggest specific topics or learning activities. Teachers should use suggestions generated by AI as a starting point, using their professional expertise to customise and adjust lesson plans to ensure learning objectives are met.

There are several ways that AI can be used to assist staff in their work, as shown in the examples below:

AI tools can be utilised to automate certain aspects of marking of pupil work, such as multiple-choice or fill-in-the-blank assessments. Teaching staff can use AI-powered marking software to speed up scoring fact-based responses to objective questions, providing more time to support pupils individually. Please note the UK GDPR restricts the processing of personal data by solely automated means and affords data subjects certain rights which must be adhered to. Staff must follow the school data protection policies and procedures and liaise with the school's data protection lead. (Please see data protection requirements below).

AI can be used by teachers to identify areas for improvement in more subjective written answers. Importantly must review and verify AI-generated marks or feedback to ensure it is accurate and add their professional judgment, especially when evaluating subjective or open-ended responses that require deeper analysis and interpretation.

Teachers can also help pupils to gain feedback on their work themselves by using AI, replicating peer assessment processes. This will allow pupils to receive instant personalised and valuable feedback and improvement strategies on their work, helping to identify misconceptions and gaps in knowledge, as well helping them develop more structured or creative writing. It is important that teaching staff play an integral role in this process and continue to monitor the feedback provided, as with peer assessment.

AI can be used to assist writing pupil reports, ensuring accuracy and efficiency while maintaining a teacher's professional judgment. Where AI has been used to help a member of staff write a report they should always review and modify the AI-generated reports to ensure they reflect their own observations, assessments, and personalised feedback.

Staff can use AI as a starting point to gather relevant information and identify patterns in pupil attainment, but they should rely on their expertise to provide a comprehensive and holistic evaluation of each pupil's progress. By using AI responsibly in pupil progress analysis, staff can streamline the process, save time, and ensure consistency. However, they remain the key decision-makers in evaluating and providing feedback on pupils' academic achievements and overall development.

Where staff use AI as part of their work, they will be clear where it has been used and what additional professional review or revision has been carried out. Staff will not use school AI tools or data for personal gain or for any means in contravention of applicable laws.

7.2 Use of AI in learning

As part of child protection and safeguarding policies and processes, the school will ensure that pupils will continue to be protected from harmful content online, including that which may be produced by AI technology and that any AI tools used are assessed for appropriateness for individual pupils' age and educational needs. The school will ensure that staff are aware of the risks of AI, which may be used to generate harmful content including deepfake and impersonation materials.

Pupils will be encouraged to explore and experiment with age-appropriate AI-based projects, allowing them to learn how to use AI for knowledge building, problem-solving, data analysis, and creative expression under the guidance of the school.

A culture of responsible AI use will be fostered through engaging pupils in conversations about data privacy, bias, safeguarding, and the social impact of AI applications.

Pupils will be taught ***not to enter personal, sensitive or confidential data*** into Generative AI tools.

AI education will be incorporated into the curriculum to provide pupils with an understanding of AI's capabilities, limitations, and ethical implications. Guidance will be provided on identifying reliable, trustworthy and age-appropriate AI sources and evaluating the credibility and accuracy of AI-generated information.

Age-appropriate AI tools and technologies [may/will] be integrated into teaching and learning activities across various subjects and year groups, providing pupils with hands-on experience and opportunities to develop AI literacy and skills.

8. Potential for the misuse of AI

Pupils will receive education on responsible and ethical AI use, including the potential risks and consequences of relying solely on AI tools to complete assignments, coursework, or homework. Pupils will be encouraged by staff to be clear and transparent about where their work has been created with the assistance of AI.

Teaching staff will emphasise the importance of critical thinking, creativity, and originality in pupil work while discouraging the misuse of AI as a means of plagiarism or academic dishonesty. Clear guidelines and expectations will be communicated to pupils regarding the appropriate use of AI tools during assessments, ensuring that their work reflects their own efforts and understanding.

Key messages are delivered primarily through Computing and school assemblies and reemphasised in all subjects where pupils are completing work for external grading.

The school will follow and adhere to any rules or guidance on the use of AI in assessments given by the Joint Council for Qualifications - [AI Use in Assessments: Protecting the Integrity of Qualifications](#)

Teaching staff will employ various assessment methods to evaluate pupil understanding and ensure that they have genuinely grasped the subject matter. This may include class discussions, oral presentations, practical demonstrations, written reflections, and project-based assessments.

By utilising diverse assessment strategies, teaching staff can verify pupils' comprehension beyond what AI tools can assess, promoting deep learning and authentic pupil engagement.

Teaching staff will educate pupils on the potential misuse of AI by those seeking to deceive or trick pupils into actions that they would otherwise not contemplate, for example interaction with others who are not who they claim to be but who can imitate who they claim to be using AI technology.

9. Data protection requirements when using AI

Staff and pupils should be aware that any information entered into a generative AI model may no longer be either private or secure. Staff and pupils must not enter any personal information (personal data, intellectual property or private information (including commercially sensitive information, such as contracts) into any Generative AI model. Staff should make themselves aware of and inform pupils about the data collection, storage, and usage practices associated with AI technologies, particularly Generative AI. Staff must read and understand the school Data Protection Policy.

Staff who wish to utilise AI tools must ensure that they follow the school's process for procuring new applications / services. It is important that the potential new use of AI will meet the school's teaching or administrative needs, and the new AI technology is assessed for risk.

Where the use of AI tools involves processing of personal data, staff must consider the principles of 'data protection by design', including minimising the use of personal data, and whether a Data Protection Impact Assessment (DPIA) is required. A DPIA screening questionnaire should be completed. If the processing is likely to result in a high risk to the rights and freedoms of individuals, then a full DPIA must be completed. The school's Data Protection Policy should be complied with, and the Data Protection Impact Assessment Process should be followed.

When signing up to use certain AI systems / tools names and email addresses may be required; this data sharing may require a Data Protection Impact Assessment to be carried out.

Any DPIA or assessment of the data protection aspects of the use of AI must include:

- The nature, scope, context and purposes of any processing of personal data and whether individuals are likely to expect such processing activities.
- Whether existing privacy notices are sufficiently transparent, require updating or whether bespoke privacy notices may be required.
- What alternatives (both AI and non-AI) are there to the planned processing and what justification is there in choosing this method and how it is fair.
- A clear indication where AI processing and automated decisions may produce effects on individuals.
- Consideration of both individual and allocated harms (for example, where the harm results from a decision to not permit a pupil to take a certain subject at GCSE or A Level) and representational harms (for example, selecting groups of pupils for different interventions results in gender or racial bias).

- How the use of the AI tool is proportionate and fair by assessing the benefits against the risks to the rights and freedoms to individuals and/or whether it is possible to put safeguards in place.
- An analysis of any bias or inaccuracy of algorithms which may result in detriment to individuals.
- If the use of AI replaces human intervention, a comparison of the human and algorithmic accuracy to justify the use of the AI tool in the DPIA.
- If automated decisions are made, how individuals will be informed about this and how they can challenge those decisions.
- Relevant variation or margins of error in the performance of the system, which may affect the fairness of the processing (including statistical accuracy) and describe if/when there is human involvement in the decision-making process.
- The potential impact of any security threats.
- A summary of completed or planned consultations with stakeholders. These are recommended unless there is a good reason not to undertake them. It may be appropriate to consult with individuals whose data you process as they are important stakeholders.
- Whether processing is intentionally or inadvertently processing special category data - there are many contexts in which non-special category data is processed, but infers special category data (for example, where a postcode infers a particular race).
- A consideration of the rights and freedoms of individuals generally, not just in a data protection context, such as rights under the Equality Act 2010.

10. Cyber Security

Our school will take appropriate measures to guarantee the technical robustness and safe functioning of AI technologies, including:

- Putting in place and then implementing appropriate rigorous cybersecurity controls, such as encryption, stringent access controls and secure storage.
- Establishing oversight procedures and controls around data practices, system changes, and incident response to maintain integrity.
- Ensuring that any suspected or confirmed security incidents are reported to the Headteacher and the Data Protection Officer.
- Carrying out an evaluation of the security of any AI system / tool before using it. This includes reviewing the tool's security features, terms of service and data protection policies. This may be included in completion of a DPIA.
- Maintaining vigilance against material that may be a deepfake (a synthetic media which can be used to create realistic and convincing videos or audio of people saying or doing things they haven't. These can be used to spread misinformation or impersonate someone to commit cyber fraud).
- Training staff and pupils to be aware of the importance of Cyber Security and the potential involvement of AI to carry out cyber-crime.

11. Monitoring and review of this policy

Should it be discovered that this Policy has not been complied with, or if an intentional breach of this Policy has taken place, senior management shall have authority to take immediate steps as considered necessary, including disciplinary action.

Artificial Intelligence Policy

Annually this policy will be subject to a review with the aim of considering any changes in legislation or good practice and hence may be amended to reflect those changes.

This policy is due for review annually; next review date May 2027.